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,				

DISTRICT COURT

CLARK COUNTY, NEVADA

CONNIE AUSTIN, an individual;

Plaintiff,
vs.

RAILROAD PASS INVESTMENT

RAILROAD PASS INVESTMENT GROUP, LLC d/b/a RAILROAD PASS CASINO; MARCUS GAMING, LLC d/b/a RAILROAD PASS CASINO; EMPLOYEE(S) / AGENT(S) DOES 1-10; and ROE CORPORATIONS 11-20, inclusive; Case No. 2:15-cv-01493-JAD-NJK

STIPULATION AND ORDER TO EXTEND TIME TO COMPLY WITH LOCAL RULE 26-1

(First Request)

Defendants.

Plaintiff Connie Austin ("Plaintiff") and Defendants Railroad Pass Investment Group, LLC d/b/a Railroad Pass Casino and Marcus Gaming, LLC d/b/a Railroad Pass Casino (collectively "Defendants), by and through their respective counsels of record, submit this stipulation to extend the time to comply with Local Rule 26-1until after the parties attend an Early Neutral Evaluation ("ENE") session. This request is prompted by the parties' desire to engage in meaningful settlement discussions through the Court's ENE program, which may fully and finally resolve this dispute, without necessitating excessive spending on what may prove to be unnecessary discovery practice.

Moreover, the Parties believe that filing a Discovery Plan and Order at this time would only cause them to require extensions of various deadlines as an ENE date has not $Page\ 1 \ of\ 2$

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1	yet been set. Therefore, as it would be more prudent to save judicial resources, the		
2	parties stipulate that a formation of discovery plan required under Local Rule 26-1 should		
3	be stayed until fourteen days after the ENE, and all time limits proscribed under Local		
4	Rule 26-1(e) shall be stayed until that date.		
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6			
7	Dated: September 4, 2015	Dated: September 4, 2015	
8	Respectfully submitted,	Respectfully submitted,	
9	By: /s/ Jeffrey Gronich	By: <u>/s/ Douglas Cohen</u>	
10	Jeffrey Gronich, Esq. Jeffrey Gronich, Attorney at Law, P.C 1810 E. Sahara Ave, Suite 109	· · · · · · · · · · · · · · · · · · ·	
11	Las Vegas, NV 89104	Fennemore Craig, P.C. 300 South Fourth Street	
12	Attorney for Plaintiff	Suite 1400 Las Vegas, NV 89101	
13		Attorneys for Defendants	
14	ІТ	IS SO ORDERED.	
15	Da	ted this <u>8th</u> day of <u>September</u> , 2015	
16	M. L.		
17	<u>UN</u>	HTED STATES JUDGE / MAGISTRATE JUDGE	
18	UN	NITED STATES MAGISTRATE JUDGE	
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